

**CSM Legal, P.C.**  
Employment and Litigation Attorneys

60 E 42<sup>nd</sup> Street, Suite 4510  
New York, New York 10165

Telephone: (212) 317-1200  
Facsimile: (212) 317-1620

December 10, 2021

**VIA ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Pablo Guerrero. v. Marquez Hass Holdings LLC, et al  
Docket No.: 21-cv-07769 (RA)

Your Honor:

Our office represents Plaintiff in the above-referenced matter. I write to respectfully request the Court for a short extension of time for Plaintiff to file a motion for a default judgment in this matter, from December 13, 2021 to December 29, 2021. This is the first request of its kind.

On November 4, 2021, the Court directed Plaintiff to file a motion for a default judgment as to Defendant Maria Marquez (“Individual Defendant”) if said Defendant did not appear, answer or otherwise respond to the Complaint by November 29, 2021. To date, the Individual Defendant has not appeared or responded to the Complaint.

On November 9, 2021, our office served Defendant Marquez Hass Holdings LLC (“Corporate Defendant”) and filed the corresponding Affidavit of Service on November 11, 2021 (E.C.F. Dkt. No. 14). The Corporate Defendant’s answer was due on November 30, 2021. However, to date, the Corporate Defendant has not appeared or responded to the Complaint.

Both Defendants are now in default. Accordingly, Plaintiff intends to file a motion for a default judgment against both Defendants and respectfully requests until December 29, 2021 to do so. Today, December 10, 2021, our office filed, *inter alia*, Certificates of Default against both Defendants in advance of filing the motion.

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Plaintiff thanks the Court for its time and consideration of this matter.

Respectfully Submitted,

/s/ William K. Oates

William K. Oates

Application granted. Plaintiff shall file his default judgment motion in accordance with the procedures set forth in Rule 4(f) and Attachment A of the Court's Individual Rules and Practices in Civil Cases.

SO ORDERED.



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Hon. Ronnie Abrams

December 13, 2021